

## Case 1:22-cv-02435-LLS-SN Document 143

DEBAETS, ABRAHAMS & SHEPPARD LLP

NEW YORK, NY 10010 T: 212 974 7474

F: 212 974 8474

Filed 03/02/23 Page 1 of 2 BENJAMIN HALPERIN

212-974-7474 BHALPERIN@CDAS.COM

March 2, 2023

## VIA ECF

The Honorable Sarah Netburn United States District Court Southern District of New York Thurgood Marshall Courthouse New York, NY 10007

Re: Lynne Freeman v. Tracy Deebs-Elkenaney et. al., 1:22 Civ 02435 (LLS)(SN)

Dear Judge Netburn:

Defendants write pursuant to Rule III. D of Your Honor's Individual Practices regarding filing redacted documents in connection with Defendants' response to Plaintiff's February 27, 2023 letter (ECF No. 139) and pursuant to the parties' Protective Order (ECF No. 50). Defendants are attaching an email chain (Ex. B) to their response that contains brief discussion of Plaintiff's personal information, and accordingly redacted those portions from the as-filed exhibit. Consistent with Your Honor's rules, Defendants are providing a sealed version of the exhibit that highlights the redactions.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Benjamin S. Halperin

Benjamin S. Halperin

## COWAN, DEBAETS, ABRAHAMS & SHEPPARD LLP

Nancy E. Wolff Benjamin S. Halperin CeCe M. Cole 41 Madison Avenue, 38th Floor New York, New York 10010 Tel: (212) 974-7474

Fax: (212) 974-8474 <u>nwolff@cdas.com</u> <u>bhalperin@cdas.com</u> <u>ccole@cdas.com</u>

## Case 1:22-cv-02435-LLS-SN Document 143 Filed 03/02/23 Page 2 of 2



Cowan,

DEBAETS,

ABRAHAMS &

 $S_{HEPPARD\ LLP}$ 

PAGE 2

Attorneys for Defendants Tracy Deebs-Elkenaney p/k/a Tracy Wolff, Entangled Publishing, LLC, Holtzbrinck Publishers, LLC d/b/a Macmillan, and Universal City Studios LLC

Cc: All counsel of record (via ECF)